

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

KAIFI LLC

Plaintiff,

v.

T-MOBILE US, INC. and  
T-MOBILE USA, INC.,

Defendants.

Case No. 2:20-cv-281-JRG

**JURY TRIAL DEMANDED**

**DECLARATION OF DAT NGUYEN IN SUPPORT OF  
KAIFI'S REPLY ISO ITS MOTION FOR LEAVE TO AMEND  
INFRINGEMENTNET CONTENTIONS DKT. NO. 92**

[REDACTED]

I, Dat Nguyen, hereby declare the following:

1. I am a member in good standing of the Bar of the State of California and an associate at the law firm LTL Attorneys, LLP, counsel for Plaintiff KAIFI LLC (“KAIFI”). I submit this declaration in support of KAIFI’S Reply in Support of Its Motions for Leave to Amend Infringement Contentions (Dkt. No. 92) in the above captioned litigation (the “Litigation”). I have personal knowledge of the facts set forth herein, and if called as witness, I could and would testify competently hereto.

2. Attached as **Exhibit A** is a true and correct copy of excerpts from T-Mobile documents cited in KAIFI’s Proposed Second Supplemental Infringement Contentions referenced in T-Mobile’s Opposition. These documents were all produced on January 15, 2021 and designated by T-Mobile as “Restricted – Attorneys Eyes Only.”

3. Attached as **Exhibit B** is a true and correct copy of email correspondence between T-Mobile (Paul Kremer) and KAIFI (Jason Sheasby), dated March 23, 2021.

4. I attended a meet and confer between the parties on March 9, 2021. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that I executed this declaration on March 29, 2021 in Los Angeles, California.

/s/ Dat Nguyen  
Dat Nguyen